

64D05-1801-CT-000107

Porter Superior Court 5

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Clerk

Porter County, Indiana

STATE OF INDIANA)
) SS: IN THE LAPORTE SUPERIOR COURT
 COUNTY OF PORTER) NO. 1, CONTINUOUS TERM
) SITTING AT MICHIGAN CITY, INDIANA

CARLA BROWN,
 Plaintiff,

v.

WALMART STORES, INC.,
 Defendant.

No.

JURY DEMAND

COMPLAINT AT LAW

COMES NOW the Plaintiff, CARLA BROWN, by and through her attorney, Theodore Leonas, Jr., Leonas Law Offices, and for her cause of action against the Defendant, WALMART STORES, INC., she states the following:

1. That at all times relevant hereto, Plaintiff CARLA BROWN was a resident of the Town of Hamlet, County of Porter, and State of Indiana.
2. That at all times relevant hereto, Defendant WALMART STORES, INC. was operating a Walmart store at 2400 Northland Dr. in the City of Valparaiso, County of Porter, State of Indiana.
3. That on January 5, 2016 at approximately 8:00 PM, Plaintiff CARLA BROWN arrived at the Walmart Store referenced in paragraph 2 above ("WALMART STORE") in her capacity as a business invitee.
4. That after parking her vehicle in the Walmart Store parking lot, Plaintiff CARLA BROWN immediately entered the Walmart Store.

5. That at approximately 10:10 PM, after exiting the Walmart Store, Plaintiff CARLA BROWN encountered an icy condition known as "black ice" in the Defendant's parking lot, causing Plaintiff to slip and fall to the ground incurring serious bodily injury.
6. That Defendant knew or should have known of the dangerous condition of its parking lot.
7. That Defendant, WALMART STORES, INC., owed duty of reasonable care in the safety of the premises, to business invitees.
8. That, by negligently failing to adequately treat the dangerous icy condition of the parking lot, Defendant, WALMART STORES, INC. breached its duty to plaintiff.
9. That as both the direct and proximate result of the negligent acts and omissions of Defendant WALMART STORES, INC., in breaching its duty to Plaintiff CARLA BROWN, she incurred personal bodily injury, pain and suffering, medical and hospital expense and permanent impairment.

WHEREFORE, Plaintiff CARLA BROWN prays this Honorable Court award her judgment against Defendant WALMART STORES, INC. in an amount that will fairly and adequately compensate her for her damages, the cost of this action, and for any and all other relief just and proper in the premises.

Respectfully Submitted,

/s/Theodore Leonas Jr.

Theodore S. Leonas, Jr

Attorney for Plaintiff

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